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*Attorneys for Defendant Google LLC (erroneously sued as Google Inc.)*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

REPUBLICAN NATIONAL COMMITTEE,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 2:22-cv-01904-TLN-JDP

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO  
RESPOND TO MOTION TO STRIKE**

1 Plaintiff Republican National Committee (“Plaintiff”) and Defendant Google LLC,  
2 erroneously sued as “Google Inc.” (“Defendant”) (collectively, the “Parties”), by and through  
3 their undersigned counsel, hereby stipulate as follows:

4 1. WHEREAS, on January 23, 2023, Defendant moved to dismiss Plaintiff’s  
5 complaint (Dkt. 30) and filed a supporting request for judicial notice (Dkt. 31);

6 2. WHEREAS, on February 27, 2023, Plaintiff opposed Defendant’s motion to  
7 dismiss (Dkt. 35) and also filed a motion to strike certain exhibits to Defendant’s request for  
8 judicial notice (Dkt. 34);

9 3. WHEREAS, Defendant’s motion to dismiss and Plaintiff’s motion to strike are  
10 both set for hearing on April 20, 2023;

11 4. WHEREAS, pursuant to the parties’ stipulation and this Court’s order,  
12 Defendant’s reply in support of its motion to dismiss is currently due on March 27, 2023  
13 (Dkts. 32, 33);

14 5. WHEREAS, pursuant to E.D. Cal. Local Rule 230(c), Defendant’s opposition to  
15 Plaintiff’s motion to strike is currently due on March 13, 2023;

16 6. WHEREAS, the parties seek to promote efficiency in the resolution of the motion  
17 to dismiss, the request for judicial notice, and the motion to strike, all of which are related;

18 7. WHEREAS, the Parties jointly request permission to extend Defendant’s deadline  
19 to respond to Plaintiff’s motion to strike so that Defendant’s opposition is due on March 27, 2023,  
20 the same day as its reply in support of its motion to dismiss (Dkt. 33);

21 8. WHEREAS, the only prior extensions that have been sought in this action relate to  
22 Defendant’s deadline to respond to the complaint and related briefing (Dkts. 13, 32), all of which  
23 extension requests were granted by the Court (Dkts. 14, 33); no prior extensions have been sought  
24 with respect to Plaintiff’s motion to strike;

1           THEREFORE, the Parties respectfully request that the Court extend Defendant's deadline  
2 to respond to Plaintiff's motion to strike to March 27, 2023, which is the same date that  
3 Defendant's reply in support of its motion to dismiss is due.

4           **IT IS SO STIPULATED.**

5           Dated: March 2, 2023

**PERKINS COIE LLP**

7           By: /s/ Sunita Bali

8           Sunita Bali, Bar No. 274108

9           *Attorneys for Defendant Google LLC*  
10          *(erroneously sued as Google Inc.)*

11          Dated: March 2, 2023

**DHILLON LAW GROUP INC.**

13          By: /s/ Thomas R. McCarthy

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18          Counsel for Plaintiff Republican National  
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23          Counsel for Plaintiff Republican National  
24          Committee

**ATTESTATION**

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued  
as Google Inc.)

**[PROPOSED] ORDER**

The Court, having reviewed the Stipulation To Extend Time To Respond to Motion To Strike, and good cause appearing, HEREBY ORDERS that Defendant's deadline to respond to Plaintiff's motion to strike is extended to March 27, 2023.

**IT IS SO ORDERED.**

Dated: March \_\_, 2023

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Hon. Troy L. Nunley  
United States District Judge

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on March 2, 2023, as follows:

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*/s/ Sunita Bali*

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